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7 Attorneys for Defendant Josef F. Boehm

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

11 SALLY C. PURSER,
12 Plaintiff,
13 v.
14 JOSEF F. BOEHM, ALLEN K.
15 BOLLING, LESLIE WILLIAMS,
16 JR., and BAMBI TYREE
17 Defendants.

Case No. 3:05-cv-00085 JKS

DECLARATION OF PAMELA S. SULLIVAN

1. I, Pamela Sullivan, am an attorney with the law firm of Wade, Kelly & Sullivan, local Alaska counsel on behalf of Josef F. Boehm.
2. I am licensed to practice law in the Alaska State Courts, the United States

1 District Court, the Ninth Circuit Court of Appeals and the United States
 2 Supreme Court.

3 3. I respectfully submit the following declaration in support of the defendant's
 4 Motion to Continue the Trial Date, filed with the Court on May 18, 2007.
 5
 6 4. The plaintiff in this matter has filed an opposition to the defendant's Motion to
 7 Continue the Trial Date, in part arguing that local counsel could "assist in
 8 meeting deadlines in this case." The issue is not only meeting deadlines, but
 9 preparing for and trying the case.
 10
 11 5. Mr. Boehm retained David Kenner and the Kenner Law Firm to represent and
 12 defend him regarding civil lawsuits filed by six plaintiffs. Two cases were
 13 filed in federal court; the above captioned case and *Wallis v. Boehm, et al.*,
 14 3:06-cv-00031-RRB. The other cases were consolidated in the Alaska
 15 Superior Court as *E.A. et al. v. Boehm v. Bolling et al.*, 3AN-05-11782 CI
 16 (Consolidated).
 17
 18 6. As local counsel, my primary focus of concentration has been on accumulation
 19 and distribution of discovery, communication with and coordination of
 20 plaintiffs' counsel, witnesses, investigators and experts regarding case planning
 21 and preparation and motion practice in the consolidated case before the Alaska
 22 Superior Court.
 23
 24 7. I was not anticipating being lead trial counsel in this matter, nor am I prepared
 25

1 for trial in this case.

2 8. In addition, Mr. Boehm retained the law firm of Wade, Kelly & Sullivan as
3 local, not primary, counsel, and I would consider it a breach of our firm's
4 agreement with Mr. Boehm if I were to act as a substitute for David Kenner
5 and the Kenner Law Firm representing Mr. Boehm as solo counsel at trial.

6 9. Accordingly, I am respectfully submitting this declaration in support of the
7 Motion to Continue the Trial Date and requesting that the Court grant the
8 defendant's motion.

10
11 DATED THIS 6th day of June, 2007.



12
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